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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF APPEALS AND INTERFERENCES

9 In re Application of

Jin Soo LEE and Hyeon Jun KIM

Serial No.: 09/594,808

Confirm. No.: 9678

Filed: June 16, 2000

For: SYSTEM, METHOD, AND MULTI-LEVEL OBJECT DATA  
STRUCTURE THEREOF FOR BROWSING MULTIMEDIA DATA

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: Group Art Unit: 2171  
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: Examiner: Cam Linh T Nguyen  
:  
: **Customer No.: 34610**

LETTER

U.S. Patent and Trademark Office  
2011 South Clark Place  
Customer Window, Mail Stop Appeal Brief-Patents  
Crystal Plaza Two, Lobby, Room 1B03  
Arlington, Virginia 22202

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Sir:

A single copy of a Reply Brief was filed on March 26, 2004 in connection with the above-identified application. This paper is being filed in order to meet the requirements under 37 C.F.R. §1.193 which require that the Reply Brief be filed in triplicate. Therefore, please find enclosed two copies of the Reply Brief filed March 26, 2004.

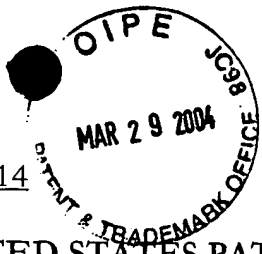
Should the Examiner have any questions regarding the above-identified application, the Examiner is invited to contact Garth D. Richmond, Reg. No. 43,044 at the telephone number listed below.

Respectfully submitted,  
FLESHNER & KIM, LLP

Ad.

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**Date: March 29, 2004**



Docket No.: CIT/K-0114

PATENT

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
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Jin Soo LEE and Hyeon Jun KIM :  
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**REPLY BRIEF UNDER 37 C.F.R. §1.193**

U.S. Patent and Trademark Office  
2011 South Clark Place  
Customer Window, Mail Stop Appeal Brief-Patents  
Crystal Plaza Two, Lobby, Room 1B03  
Arlington, Virginia 22202

Sir:

This Reply Brief is submitted in response to and within two months of the Examiner's Answer of January 30, 2004 in support of the Notice of Appeal filed October 21, 2003, and is submitted in triplicate.

**REAL PARTY IN INTEREST**

The party in interest is the assignee, LG Electronics Inc.

### RELATED APPEALS AND INTERFERENCES

Appellants are unaware of any related appeals or interferences.

### STATUS OF THE CLAIMS

Claims 1, 3-18, 20, 23-27, and 30-33 are pending.

### STATUS OF AMENDMENTS

All Amendments filed in the application have been entered. A correct copy of appealed claims 1, 3-18, 20, 23-27, and 30-33, including all entered amendments thereto, appears in the attached Appendix.

### SUMMARY OF THE INVENTION

Embodiments of the present invention relate to browsing of multimedia data. (Specification at page 1, lines 1 and 2). In embodiments, the browsing of multimedia data includes browsing supplementary information on a particular object included in a moving picture. (Specification at page 3, lines 21-23). In some embodiments, supplementary information includes both content information and real information. (Specification at page 4, lines 18-20). Content information is information on a place or an object having a meaning in view of content of the moving picture, and real information is information on a real place which is a meaningful place in view of the content of the moving picture. (Specification at page 6, lines 3-6).

### ISSUE

Whether the Examiner erred in the rejection of claims 1, 3-18, 20, 23-27, and 30-33 under 35 U.S.C. § 102(e) because Jain et al. fails to disclose multiple supplementary information that includes content information that is information on a place or an object having meaning in view of content of a moving picture, and real information that is information on a real place which is a meaningful place in view of the content of the moving picture.

### GROUPING OF THE CLAIMS

Appealed claims 1, 3-18, 20, 23-27, and 30-33 form a single group and stand or fall together.

### ARGUMENT

A *prima facie* case of anticipation has not been established in the rejection of claims 1, 3-18, 20, 23-27, and 30-33 under 35 U.S.C. § 102(e) because Jain et al. does not disclose multiple supplementary information that includes content information that is information on a place or an object having meaning in view of content of a moving picture, and real information that is information on a real place which is a meaningful place in view of the content of the moving picture.

To establish a *prima facie* case of anticipation under 35 U.S.C. § 102, a single prior art reference must describe each and every element as set forth in the subject claim. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the [subject] claim."

*Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Also see M.P.E.P. § 2131.

Jain et al. relates to an interactive multimedia information system having a multi-perspective viewer for interactively viewing multimedia events recorded and maintained by the interactive multimedia system. (Col. 4, lines 63-65; and Fig. 4). The multi-perspective viewer of Jain et al. outputs a display that has a number of multimedia information viewing areas or windows, including a statistics and information viewing window, and a query processing area. (Col. 22, lines 10-14 and 23-25; and Fig. 7). The query processing area has a number of pop-up menus that can be selected by a user to query the multimedia system by individual items of interest, including objects. (Col. 30, 17-28; and Fig. 7). Selection of the “object” menu displays an “object profile” to the user, as shown in Figure 9. (Col. 30, lines 27-33; and Fig. 9). The profile 500 has a number of display areas that display information about the selected item by category, including a textual information display area 502, a statistics display area 508, and an event summary display area 510 that includes a textual description of a selected event. (Col. 30, line 43 – col. 31, line 4).

The Examiner’s Answer, at page 4, draws a correspondence between the event summary information displayed in Jain et al. and the “content information” recited in the claimed invention, and between textual and statistical information about the selected item and the “real information” recited in the claimed invention. Specifically, with respect to “real information,” the Examiner’s Answer, at pages 7 and 8, indicates that the multimedia system of Jain et al. includes a variety of data associated with an event that is input during the setup process, including the name, description, and history of a stadium in which the event occurs as set forth

in Table 1 of Jain et al. According to the Examiner, such information can be displayed in the textual 502 and statistical 508 information display areas. Based upon the interpretation of the multimedia system of Jain et al. set forth in the Examiner's Answer, the content information and real information of the claimed invention are distinct from the information input and displayed in the multimedia system of Jain et al.

As noted above, the supplementary information of the claimed invention includes both content information and real information. The terms, content information and real information, are clarified by the description and examples of the same as set forth in the specification. The present application, for example, provides that content information having a meaning in view of the content of the moving picture, includes content information on a particular program, i.e., program content based information (e.g., fictitious, story line information); whereas, real information that is information on a real place which is a meaningful place in view of the content of the moving picture, includes actual information. (Specification at page 4, lines 18-20; page 8, lines 12-20; page 9, line 20 – page 10, line 21; page 11, line 21 – page 12, line 17; and page 13, line 1-11).

That is, supplementary information related to a particular object appearing in two separate moving pictures, according to the claimed invention, may include content information that differs as to the object, but include real information that is identical. By way of example, a building appearing in two separate moving pictures may have different names, locations, etc. as between the two moving pictures, but the actual name, location, etc. of the building are the same as between the two moving pictures, which is not possible in the multimedia system of Jain et al. That is, according to the Examiner's Answer, the information in Jain et al. corresponding to real

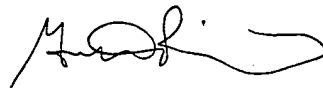
information and content information of the claimed invention does not vary from one media event to another, i.e., stadium information concerning a particular stadium (e.g., the name, description, etc.) is the same in every multimedia event in which the stadium appears.

Because Jain et al. does not disclose all the features of the claims, a *prima facie* case of anticipation under 35 U.S.C. § 102 has not been established for claims 1, 3-18, 20, 23-27, and 30-33. Accordingly, Appellants respectfully submit that the rejection of claims is improper.

**CONCLUSION**

For the foregoing reasons, Appellants respectfully request the Honorable Board of Appeals and Interferences of the U.S. Patent and Trademark Office to withdraw the rejections of claims 1, 3-18, 20, 23-27, and 30-33 because *prima facie* case of anticipation has not been established.

Respectfully submitted,  
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Date: March 26, 2004

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**APPENDIX**

1. A method for browsing a moving picture comprising:

receiving moving picture information and multiple supplementary information including content information and real information on a program in the moving picture information on at least one object in the moving picture information;

separating the moving picture information and the multiple supplementary information;

displaying the moving picture information; and,

browsing/searching supplementary information related to a particular object from the multiple supplementary information, and displaying the supplementary information when a user requests for browsing/searching the supplementary information related to the particular object, wherein:

content information is information on a place or an object having meaning in view of content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

3. A method as claimed in claim 19, wherein the content information and the real information includes selective combinations of object information, event information, place information, and object/event/place in a graph.

4. A method as claimed in claim 3, wherein the content information and the real information includes;

text information describing character of the object, and  
image or graphic information on the character.

5. A method as claimed in claim 3, wherein the object information includes;  
text information having information describing the object, and  
an image illustrating the text information.

6. A method as claimed in claim 3, wherein the event information includes;  
text information describing contents of the event, and  
information on a place or a sketch map the event occurred.

7. A method as claimed in claim 3, wherein the place information includes;  
text information describing the place, and  
information on location or a sketch map of the place.

8. A multi-level object data structure in a system for displaying moving picture information, wherein:

the object data comprises multiple supplementary information on each object included in the moving picture information, wherein the multiple supplementary information further includes content information and real information on a particular program;

content information is information on a place or an object having meaning in view of content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

9. A multi-level object data structure as claimed in claim 8, wherein the content information and the real information includes selective combinations of semantic information which represents object information, event information, place information, and semantic information representing relations of object/event/place information in a graph.

10. A multi-level object data structure as claimed in claim 9, wherein the content information and the real information includes;

text information describing character of the object, and

image or graphic information on the character.

11. A multi-level object data structure as claimed in claim 9, wherein the object information includes;

text information having information describing the object, and

an image illustrating the text information.

12. A multi-level object data structure as claimed in claim 9, wherein the event information includes;

text information describing contents of the event, and

information on a place or a sketch map the event occurred.

13. A multi-level object data structure as claimed in claim 9, wherein the place information includes;

text information describing the place, and

information on location or a sketch map of the place.

14. A multi-level object data structure describing a moving picture in an object description scheme for providing information on an object appearing in the moving picture, a place description scheme for providing information on a place required for describing a particular unit of event in the moving picture, and a relation graph description scheme of the object/event/place, and,

describing the moving picture in a dual structure including content information and real information of the moving picture on at least one relation for each of the relations or a selected element, wherein:

content information is information on a place or an object having meaning in view of

content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

15. A multi-level object data structure as claimed in claim 14, wherein each of the object description scheme, the place description scheme, and the event description scheme, including content information and real information of the moving picture, are expressed in text information describing at least object name, place name, and event.

16. A multi-level object data structure as claimed in claim 14, wherein the content information on the moving picture is information on a place or an object having a meaning in view of content of the moving picture, and the real information is information on a real place which is meaningful place in view of the content of the moving picture, or on actual performer cast an object in the moving picture.

17. A system for browsing a moving picture comprising:

means for supplying moving picture information including multiple object information having content based meaningful object information of the moving picture and real information of the object;

means for receiving the moving picture information;

means for presenting real object information included in the multiple object information in response to a users request, wherein:

content based meaningful object information is information on a place or an object having meaning in view of content of the moving picture; and  
real information is information on a real place which is a meaningful place in view of the content of the moving picture.

18. A system as claimed in claim 17,

wherein the multiple object information are provided for each of the object, the place, and the event,

wherein the means for presenting real object information provides real information on an object cast in the moving picture or real place information on the place which is a background of an event.

20. A method comprising receiving supplemental information specific to each object of a plurality of objects included in moving picture data, wherein:

said each object of the plurality of objects is at least one of a person, a place, and a thing; and

the supplemental information includes real information and content information, wherein:

content information is information on a place or an object having

meaning in view of content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

23. The method of claim 20, wherein the person is at least one of:

a person whose image is captured, depicted, or illustrated on the moving picture data;

a person whose voice is being captured, depicted, or illustrated on the moving picture data; and

a person who is associated with the production of the moving picture data.

24. The method of claim 20, wherein the place is the location

captured, depicted, or illustrated on the moving picture data.

25. The method of claim 20, wherein the thing is at least one of:

sound captured on the moving picture data;

an object captured, depicted, or illustrated on the moving picture data; and

an attribute of the moving picture data.

26. The method of claim 25, wherein the sound captured is at least one of a musical

song, a natural sound, or verbal language.

27. An apparatus configured to receive supplemental information specific to each object of a plurality of objects included in moving picture data, wherein:

the each object of the plurality of objects is at least one of a person, a place, and a thing; and

the supplemental information includes real information and content information, wherein:

content information is information on a place or an object having meaning in view of content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

30. The apparatus of claim 27, wherein the person is at least one of:

a person whose image is captured, depicted, or illustrated on the moving picture data;

a person whose voice is being captured, depicted, or illustrated on the moving picture data; and

a person who is associated with the production of the moving picture data.

31. The apparatus of claim 27, wherein the place is the location captured, depicted, or illustrated on the moving picture data.



32. The apparatus of claim 27, wherein the thing is at least one of:

sound captured on the moving picture data;

an object captured, depicted, or illustrated on the moving picture data; and

an attribute of the moving picture data.

33. The apparatus of claim 32, wherein the sound captured is at least one of a musical song, a natural sound, or verbal language.